

## **Deficiency Progress Report**

To complete the evaluation process, CUPAs submit Deficiency Progress Reports to Cal/EPA that explain their progress towards correcting the identified deficiencies. Deficiency Progress Reports are typically due every 90 days after the evaluation date until all deficiencies have been corrected.

**CUPA:** Inyo County Environmental Health Services  
**Evaluation Date:** October 3 and 4, 2007  
**Evaluators:** JoAnn Jaschke, CalEPA  
Sean Farrow, SWRCB

**Date update 1 was submitted:** December 31, 2007  
Deficiency corrected with this update: Deficiency 1.

### **Status of Deficiencies**

- 1. Deficiency:** The CUPA is not citing violations in a manner consistent with the definition of Minor, Class II, and Class I as provided in statute and regulations.

**CUPA Corrective Action, (Update 1):** The only facility that was inspected and had violations was Inyo County Road Department. In our letter we notified them that not labeling their waste oil containers with accumulation start date were "class II violations of Title 22 66262.34". I will have about 10 haz waste inspections before the end of June. I expect 2 or 3 of them will have a labeling violation and will be marked as an appropriate violation.

**Cal/EPA Response:** Cal/EPA feels the CUPA has sufficiently corrected this deficiency. No further updates are needed for this deficiency.

- 3. Deficiency:** The CUPA is not ensuring that all UST facilities have current financial responsibility forms.

**CUPA Corrective Action, (Update 1):** 7 facilities did not have financial responsibility forms. Along with their billing we sent a letter that financial responsibility forms must be returned to us by 3/1/08 when their permit is renewed. We should have full FR compliance by April.

**SWRCB Response:** SWRCB feels the CUPA is making good progress towards correcting this deficiency. In the next deficiency progress report, due April 1, 2008, please update Cal/EPA on the status of correcting this deficiency.